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November 11, 2022

***Via ECF***

Hon. Judge Rukhsanah L. Singh  
Clarkson S. Fisher Bldg. & U.S. Courthouse  
402 E. State Street  
Trenton, New Jersey 08608

**Re: Antonio Popola and Erin Popola v. TL Transportation**  
**Docket No.: 3:22-cv-03354**  
**Our File No.: 578-0285**

Dear Honorable Judge Singh:

Please accept this letter as a joint status letter in advance of the upcoming conference scheduled for November 17, 2022 at 11 a.m.

On October 27, 2022, Your Honor granted a request for an extension of discovery, and at this time, document discovery is ongoing. Defendants served Rule 26 Disclosures on October 27, 2022, and interrogatory and document demands on November 1, 2022. Plaintiff expects to exchange Rule 26 Disclosures and discovery demands within the next 10 days. The parties are working on scheduling depositions in the month of January, 2023.

In addition to working on document discovery, the parties have also recently been discussing a concession of liability by Defendants TL Transportation and its driver, Defendant Erin Godfrey Richardson, in exchange for a dismissal of the claims against the Amazon entities, as well as a dismissal of the punitive damages claims.

Additionally, defendants' counsel has recently forwarded to plaintiffs' counsel an Affidavit and a Stipulation of Dismissal as to Defendant EAN Holdings, LLC pursuant to the Graves amendment, federal statute, 49 U.S.C. § 301.06.

Finally, although no demands or offers have been made, both parties are interested in settlement of this case and hope to get negotiations underway prior to having to incur the costs of additional discovery. Plaintiffs' counsel expects to have a settlement demand to Defendants' counsel by December 1, 2022.

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Please feel free to contact us with any questions.

Respectfully submitted,

*s/Allyson B. Belmont*  
ALLYSON B. BELMONT

Respectfully submitted,

*s/James M. Curran*  
JAMES M. CURRAN

ABB:cb  
4873-3332-4606

cc:

***Via ECF***

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